REMARKS

The Examiner is thanked for the thorough examination of the present application, and for correctly indicating the allowability of the subject matter of Claims 2-10, 12-20, 22-23, and 32-38. In view of the arguments presented in detail below, it is submitted that all of the claims are patentable.

I. The Claimed Invention

The present invention is directed to an integrated circuit for a smart card. As recited in independent Claim 1, for example, the integrated circuit includes a transceiver and a processor for communicating with a host device via the transceiver and performing a plurality of smart card applications. More particularly, the processor is for cooperating with the host device to perform an enumeration based upon at least one default descriptor, generating a look-up table for allocating data to respective smart card applications based upon the enumeration, and detecting a system event. Furthermore, responsive to the system event, the processor cooperates with the host device to perform a new enumeration based upon at least one alternate descriptor, and generates a new look-up table based thereon.

Independent Claim 11 is directed to a related smart card, and independent Claim 21 is directed to a related smart card system. Furthermore, independent Claim 31 is directed to a

related method for operating a smart card for performing a plurality of smart card applications.

II. The Claims Are Patentable

The Examiner rejected independent Claims 1, 11, 21 and 31 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Pub. No. 2005/0251596 to Maier in view of U.S. Patent No. 6,463,537 to Tello. Maier is directed to a USB system that includes a main device and an auxiliary device (e.g., a USB smart card) arranged to co-operate with each other. The auxiliary device is arranged to effect a core functionality. The auxiliary device comprises descriptors. The system is characterized in that the auxiliary device comprises at least one descriptor that defines a functionality that is different from the core functionality. See, e.g., paragraphs 0016 through 0020 of Maier.

The Examiner correctly acknowledges that Maier fails to teach or fairly suggest generating a look-up table for allocating data to respective smart card applications based upon the enumeration, and detecting a system event and, responsive to the system event, performing a new enumeration in cooperation with the host device based upon at least one alternate descriptor and generating a new look-up table based thereon, as recited in the above-noted independent claims. However, the Examiner contends that Tello somehow provides the noted deficiencies.

Tello is directed to a personalized computer with a unique encrypted digital signature which will not boot up or recognize any data storage or communication peripheral devices without a matching personalized smart card containing a complementary encrypted digital signature. A modified BIOS (Basic Input Output System) replaces the standard BIOS of a motherboard and allows a security engine microprocessor to take over preboot control of the computer from the motherboard CPU (Central Processing Unit), configures and operates the encryption-based security system, and enables or disables selected data storage devices and other user-selectable peripherals upon start up and shut down of the computer. Upon power up, reset or interrupt of the computer, the microprocessor looks for, and if present, reads from the smart card in the smart card reader which is logically connected to the security engine microprocessor. A software program compares a unique digital signature placed in the smart card to a digital signature assigned to the computer. If these two digital signatures are complementary, the boot up procedure is allowed to continue as is access to the computer up to a predetermined level depending on the level of access configured on the smart card. See, e.g., col. 4, line 57 through col. 5, line 48 of Tello.

It is respectfully submitted that the Examiner mischaracterizes the teachings of Tello, and that the selective

combination of references proposed by the Examiner taken as a whole fails to teach or fairly suggest all of the recitations of the above-noted independent claims. The Examiner points to col. 9, lines 26-31 of Tello contending that the computer security system noted therein somehow provides the above-noted deficiencies of Maier. This passage is reproduced below:

> "An encrypted table of smart card code numbers are also stored in the flash memory of the security engine. This table is used during the operation of the invention to identify the purpose and type of smart card inserted in the smart card reader which is logically connected to the security engine." Tello, col. 9, lines 26-31 (emphasis added).

As an initial matter, the security engine of Tello is not even part of a smart card. Rather, the security engine is housed on the motherboard of the personal computer (i.e., host) to which the smart card is to be connected. See col. 6, lines 22-45. Accordingly, the security engine simply cannot be fairly characterized as a processor of a smart card integrated circuit for performing the operations recited in the above-noted independent claims.

Moreover, the "encrypted table of smart card code numbers" is not a look-up table for allocating data to respective smart applications that is generated each time a smart card is enumerated or re-enumerated. That is, the Tello table is a static

table that stores encrypted code numbers for identifying different types of smart cards that may be connected to the personal computer. Nowhere does Tello teach or fairly suggest that this table is generated upon enumeration (or re-enumeration) of a smart card. Rather, this table is generated ahead of time prior to connection (and, thus, prior to enumeration) of a smart card to the computer.

Since none of the remaining prior art of record properly provides the above-noted deficiencies, it is submitted that independent Claims 1, 11, 21 and 31 are patentable over the prior art.

CONCLUSION

In view of the foregoing, it is submitted that all the claims are patentable. Accordingly, a Notice of Allowance is requested in due course. Should any minor informalities need to be addressed, the Examiner is encouraged to contact the undersigned attorney at the telephone number listed below.

In re Patent Application of:
LEAMING
Serial No. **10/828,747**
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Respectfully submitted,

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